d.) Remarks

Claims 1-35 are pending in this application. Claims 7, 14, 20, 25, 26, and 27 have been amended in various particulars. New claims 29-35 have been added to alternatively define Applicants' invention.

Minor amendments have been made to some of the claims, the specification, and the drawings. Specifically, some grammatical errors were corrected in claims. Also, a duplicate reference number was noted. As a result, the controller in Fig. 4 is now referenced with reference numeral 39. The corresponding portion of the specification has also been corrected to reference the controller with this new reference numeral.

Referring to the Office Action Summary Page, Applicants note, with appreciation, the allowance of claims 27 and 28. Further, we also note, with appreciation, the indication that claims 14 and 26 contain allowable subject matter; these claims have been amended to an independent format to place them in condition for allowance.

Applicants request clarification relative to the drawing objection. Specifically, the Office Action Summary Page indicates that the drawings filed on 23 October 2001 were objected to. The Office Action, however, does not seem to set forth a basis for this objection. Applicants request clarification of the basis for this objection or its withdrawal.

Turning now to the merits, the present invention is directed to a system for a platesetter or imagesetter. These are devices that are used in the fabrication of the plates for offset printing, for example. Specifically, the present invention is directed to establishing the required alignment of the imagable media, such as plate or film, on a media support surface, such as an external or internal drum. The system has a combination of a light source and light sensor, which is responsive to light from the light source. A groove is formed in the drum to affect how the light is relayed from the source to the sensor. In this way, the light from the source is modulated, based upon the presence, or not, of the imagable media, allowing the media edge to be detected.

The primary basis for the prior art rejections is the rejection of claims 1, 2, 12, 13, and 15-17 under 35 U.S.C. § 103(a), as being unpatentable over U.S. Pat. No. 4,976,545 to Kipphan, *et al.* (Kipphan patent), in view of U.S. Pat. No. 4,687,943 to Bowen, *et al.* (Bowen patent). This rejection is respectfully traversed for the following reasons.

The Kipphan patent is generally directed to a sensor device for analysis of surface structure. Specifically, it concerns a system that is able to detect the presence and quality of water ink emulsions on a plate 1. Of note is that fact that this reference does not comprehend analyzing the alignment of that plate, but is instead directed to detecting how wet the plate is.

The Bowen patent is directed to a film inspection system. The relevant portion of the patent is relative to its Fig. 4 where the Bowen patent shows the combination of a light source and detector system that can be used in combination with a roller 12 having a circumferential groove 69. It is used to detect the sprocket holes 77 on the continuous film loop 11.

Applicants respectfully believe that the present independent claims would not be rendered obvious by the two applied references for a number of reasons.

First, the Applicants respectfully assert that the pending Office Action has miscomprehended the scope and teachings of the applied references. Specifically, in page two of the pending Office Action, it was stated that "Bowen, *et al.* teach (see Fig. 1A and 4) a system for detecting the edge of a film comprising a drum/platesetter (12)..." The Bowen patent, however, is not directed to a platesetter or imagesetter. Instead, it is directed to a film inspection system. In short, it does not image or expose the film. Instead, it is used to detect the sprocket holes. Thus, the rejection is based on an incorrect interpretation of the references.

This point is material since claim 1, for example, is directed to a platesetter. In a similar vein, new claim 26 is directed to a platesetter or imagesetter.

Moreover, Applicants respectfully take the position that none of the applied references shows or suggests specific features of the independent claims. For example, claim 1 requires a "movable assembly" that comprises the light source and the light sensor. In contradistinction, the corresponding light sensor of the Bowen system is generally stationary. In a somewhat similar vein, claim 16 is directed to an apparatus for detecting an edge of an imagable media for an imagesetter or platesetter. This apparatus also comprises a moveable assembly.

Applicants thus respectfully request withdrawal of these rejections since claimed features are not shown or suggested by either of the applied references.

In related rejections, claims 3-7, 10, 11, 18-20 and 22-25 were rejected over the references as applied to claim 1, in further view of U.S. Pat. No. 5,992,325 to Shumann, *et al.* Further, claims 8 and 21 were rejected over the Kipphan, Bowen, and Shumann patents, applied to claim 1, in further view of U.S. Pat. No. 5,046,159. (Note that there seems to be a technical problem with this rejection since the Schumann, *et al.* patent was not applied to claim 1.) Finally, claim 9 was rejected as being unpatentable over the Kipphan, Bowen, and Shumann patents, as applied to claim 1, in further view of U.S. Pat. No. 6,469,808 to Onishi, *et al.*

None of these other applied references, however, shows or suggests the claimed combination, in a platesetter and/or imagesetter, combining a light source, light sensor, and groove, which affects light reflection to the light sensor. Thus, Applicants respectfully believe that the claims are distinguishable over the applied references.

Turning now to new claim 29, it is directed to a system for detecting an edge of an imagable media. It also comprises a light sensor and a light source. A groove is further formed in the media support surface. The light sensor provides a signal having different levels corresponding to said imagable media and said groove.

None of the applied references shows or suggests such combination where a groove is used on a media support surface in a platesetter or imagesetter, in order to

provide a contrast between the imagable media and the media support surface, via a groove therein.

Applicants believe that the present application is in condition for allowance. A Notice of Allowance is respectfully solicited. Should any questions arise, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

By _____
J. Grant Houston, Attorney for Agfa Corp.
Registration No.: 35,900
Tel.: 781 863 9991
Fax: 781 863 9931

Lexington, Massachusetts 02421
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